

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

FRANCIS RYAN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CASE NO.: 3:08 CV 50137
	)	
FLEXI-BOGDAHN INTERNATIONAL,	)	
GMBH & CO KG, a German corporation,	)	Magistrate Judge Mahoney
FLEXI USA, INC., a Wisconsin	)	
corporation and WAL-MART STORES,	)	
INC., an Arkansas corporation,	)	
	)	
Defendants.	)	

**DEFENDANT FLEXI USA, INC. AND WAL-MART STORES, INC.'S MOTION FOR  
PROTECTIVE ORDER**

NOW COME Defendants, Flexi USA, Inc. and Wal-Mart Stores, Inc., by and through their attorneys, Litchfield Cavo LLP, and for their Motion for Protective Order pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, state as follows:

1. Plaintiff has filed a complaint against Defendants, Flexi USA, Inc. and Wal-Mart Stores, Inc. for claimed personal injuries as a result of an allegedly defective dog leash.
2. Upon information and belief, Plaintiff is in possession and control of the allegedly defective dog leash involved in the accident alleged in the complaint.
3. Good cause exists and justice requires that the allegedly defective dog leash identified in the complaint be preserved until further order of court.
4. Defendants request that this Court enter a protective order prohibiting Plaintiff, or anyone on Plaintiff's behalf, from surrendering the dog leash involved in the accident alleged in Plaintiff's complaint to anyone and/or prohibiting any testing be

performed on the dog leash involved in the accident alleged in Plaintiff's complaint without order of this Court.

5. Defendants further request that this Court enter a protective order requiring Plaintiff, and anyone on Plaintiff's behalf, to preserve the dog leash involved in the accident alleged in Plaintiff's complaint until further order of this Court.

WHEREFORE, Defendants, Flexi USA, Inc. and Wal-Mart Stores, Inc., request that this Honorable Court issue a protective order pursuant to Rule 26(c) of the Federal Rules of Civil Procedure: (1) prohibiting Plaintiff, or anyone on Plaintiff's behalf, from surrendering to anyone the dog leash involved in the accident alleged in Plaintiff's complaint without order of this Court; (2) prohibiting any testing to be performed on the dog leash involved in the accident alleged in Plaintiff's complaint without order of this Court; (3) requiring Plaintiff, and anyone on Plaintiff's behalf, to preserve the dog leash involved in the accident alleged in Plaintiff's complaint until further order of this Court; and, (4) awarding such other relief as this Court deems just and proper.

Respectfully submitted,

By: /s/ Nicholas J. Parolisi, Jr.  
Nicholas J. Parolisi, Jr.

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